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21 UNITED STATES DISTRICT COURT
22 DISTRICT OF NEVADA

23 THE ESTATE OF BARRY ISOM, by and
24 through its Executrix, Mary Love-Isom;
25 Jaimee Isom Newberry and Kimberlee Isom
26 Grindstaff;

27 Plaintiffs,

28 v.

UNITED STATES OF AMERICA, and
DOES 1 through 100, inclusive,

Defendants,

Case No.:2:14-cv-00475-JAD-VCF

**STIPULATED REQUEST FOR
LIMITED EXTENSION OF
SCHEDULING DEADLINES AND
JOINT REQUEST FOR REVISED
SCHEDULING ORDER (Eighth
Request)**

Pursuant to Local Rules 6-1, 26-4, and Fed. R. Civ. P. 6(b), the parties stipulate, subject to this Court's approval, the deadlines in the approved discovery schedule be extended for one (1) day for the reasons noted below.

1. **Status Report.** This request is made 18 days before the current close of discovery, which is set for July 25, 2016. Pursuant to Local Rules 6-1(b) and 26-4, this request is timely in that it is made before the discovery cutoff. The parties' stipulation should be approved due to scheduling conflicts with attorneys and limited availability with one of the remaining experts to be deposed. The referenced expert is only available on Tuesday mornings, and counsel could not find a Tuesday within the current deadline where they were both available. Thus, Plaintiff is requesting one (1) additional day so that the deposition may be held on Tuesday, July 26, 2016. The Court granted the first through seventh extensions of discovery deadlines in this case on January 12, 2015 (ECF No. 27), April 24, 2015 (ECF No. 34), July 22, 2015 (ECF No. 40), August 31, 2015 (ECF No. 43), October 14, 2015 (ECF No. 47), and June 9, 2016 (ECF No. 55).

2. **Status/Discovery Completed.** The parties have completed all discovery except for depositions of expert witnesses.

3. **Discovery remaining.** The parties' remaining discovery is limited to depositions of both parties' experts.

4. **Reasons for extension.** Plaintiff's expert is only available on Tuesday mornings, and counsel could not find a Tuesday within the current deadline where they were both available. Thus, the request for one (1) additional day so that the deposition may be held on Tuesday, July 26, 2016. The parties do not seek to change any other remaining discovery deadlines. The parties stipulate to this extension in good faith and not for the purpose of unnecessarily delaying the proceedings.

5. **Revised discovery schedule.**¹ The parties stipulate and agree to the following revised discovery plan and ask that the Court adopt it as the revised scheduling order in this case.

¹Pursuant to Fed. R. Civ. P. 6(a)(c) deadlines falling on a weekend or legal holiday "run until the next day that is not a Saturday, Sunday, or legal holiday"

A. **Discovery Deadline:** The discovery deadline shall be July 26, 2016, forty-eight days after the parties' settlement conference for the limited purpose of allowing the parties to take the depositions of disclosed expert witnesses.

B. **Dispositive Motions**: Dispositive motions, if any, shall be filed by August 23, 2016, 30 days after the discovery cutoff.

C. **Joint Pretrial Order:** A Joint Pretrial Order shall be filed 30 days after the deadline for filing dispositive motions. However, if any dispositive motions are filed, then the Joint Pretrial Order shall be due 30 days after decision on such motion(s). Disclosures under Fed. R. Civ. P. 26(a)(3), and any objections thereto, shall be included in the Joint Pretrial Order.

Respectfully submitted this 11th day of July, 2016.

DANIEL G. BOGDEN
United States Attorney

JUSTICE LAW CENTER
MARQUIZ LAW OFFICE, PC

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 KRYSTAL J. ROSSE, ESQ.

/s/ Bret O. Whipple
BRET O. WHIPPLE, ESQ.
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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 7-11-2016